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**From:** Drue Winters [dwinters@fisheries.org]  
**Sent:** 12/17/2019 3:23:53 PM  
**To:** Molloy, Jennifer [molloy.jennifer@epa.gov]  
**Subject:** RE: Kampachi public comments on the NPDES permit

Thank you!

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**From:** Molloy, Jennifer <molloy.jennifer@epa.gov>  
**Sent:** Tuesday, December 17, 2019 9:37 AM  
**To:** Drue Winters <dwinters@fisheries.org>  
**Cc:** Salze, Guillaume <salzeg@ajiusa.com>; Halley Froehlich <hefroehlich@ucsb.edu>; Michael Rust <mike.rust@noaa.gov>; Watson, Craig A <cawatson@ufl.edu>; Halley Froehlich <froehlich@nceas.ucsb.edu>  
**Subject:** RE: Kampachi public comments on the NPDES permit

Notice for the public hearing attached.

Jenny Molloy  
U.S. EPA  
Water Permits Division  
202.564.1939  
[molloy.jennifer@epa.gov](mailto:molloy.jennifer@epa.gov)

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**From:** Drue Winters <dwinters@fisheries.org>  
**Sent:** Friday, October 4, 2019 10:52 AM  
**To:** Molloy, Jennifer <molloy.jennifer@epa.gov>  
**Cc:** Salze, Guillaume <salzeg@ajiusa.com>; Halley Froehlich <hefroehlich@ucsb.edu>; Michael Rust <mike.rust@noaa.gov>; Watson, Craig A <cawatson@ufl.edu>; Halley Froehlich <froehlich@nceas.ucsb.edu>  
**Subject:** Re: Kampachi public comments on the NPDES permit

Hi-I did speak with our Fish Culture section in Reno at our annual meeting about the pending permit and opportunities for further engagement. I will circle back about AFS officially commenting or testifying. Is there a date for the hearing scheduled or an idea of when it might be?

Thanks!

Drue

Sent from my iPhone

On Oct 4, 2019, at 10:48 AM, Molloy, Jennifer <molloy.jennifer@epa.gov> wrote:

No, we rarely get letters that say "Excellent permit! I'm in support." People in support of permitting an operation generally do not provide comments unless they have a direct stake. I think that's just human nature. Occasionally it happens, and when it does we can use those as a counter point in our Response to Comments documents, and in support of finalizing/issuing the permit. However, it's the permit writer's job to establish a strong record in support of permit conditions/limitations, so that we can defend it when it's challenged (in comments or in legal action). I think this one has a strong record, though it appears that the folks who submitted those letters haven't read through it.

Jenny Molloy

U.S. EPA  
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202.564.1939  
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**From:** Salze, Guillaume <[salzeg@ajiusa.com](mailto:salzeg@ajiusa.com)>  
**Sent:** Friday, October 4, 2019 10:24 AM  
**To:** Molloy, Jennifer <[molloy.jennifer@epa.gov](mailto:molloy.jennifer@epa.gov)>; Halley Froehlich <[hefroehlich@ucsb.edu](mailto:hefroehlich@ucsb.edu)>  
**Cc:** Drue Winters <[dwinters@fisheries.org](mailto:dwinters@fisheries.org)>; Michael Rust <[mike.rust@noaa.gov](mailto:mike.rust@noaa.gov)>; Watson, Craig A <[cawatson@ufl.edu](mailto:cawatson@ufl.edu)>; Halley Froehlich <[froehlich@nceas.ucsb.edu](mailto:froehlich@nceas.ucsb.edu)>; Cynthia Sandoval - NOAA Federal <[cynthia.sandoval@noaa.gov](mailto:cynthia.sandoval@noaa.gov)>; Camryn Anderson <[canderson@fisheries.org](mailto:canderson@fisheries.org)>  
**Subject:** RE: Kampachi public comments on the NPDES permit

No surprise there, indeed. Is the overwhelming majority of these 7000 emails negative, because no one (but us!) think positively about this, or is it because the people who have a positive opinion simply do not communicate their opinion? My guess is it's a bit of both.

A public hearing is a very good idea, as it may be a good platform to present the case for this permit and aquaculture in general, do a bit of education that will be heard (hopefully), and not get drowned in negativity.

Cheers,

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<[image002.jpg](#)>Guillaume Salze, Ph.D.  
Aquaculture Nutritionist – AJINOMOTO ANIMAL NUTRITION NORTH AMERICA, INC.  
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8430 W. Bryn Mawr Ave. Suite 650, Chicago, IL 60631-3421

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**From:** Molloy, Jennifer <[molloy.jennifer@epa.gov](mailto:molloy.jennifer@epa.gov)>  
**Sent:** Friday, October 4, 2019 7:15 AM  
**To:** Halley Froehlich <[hefroehlich@ucsb.edu](mailto:hefroehlich@ucsb.edu)>  
**Cc:** Drue Winters <[dwinters@fisheries.org](mailto:dwinters@fisheries.org)>; Michael Rust <[mike.rust@noaa.gov](mailto:mike.rust@noaa.gov)>; Watson, Craig A <[cawatson@ufl.edu](mailto:cawatson@ufl.edu)>; Halley Froehlich <[froehlich@nceas.ucsb.edu](mailto:froehlich@nceas.ucsb.edu)>; Salze, Guillaume <[salzeg@ajiusa.com](mailto:salzeg@ajiusa.com)>; Cynthia Sandoval - NOAA Federal <[cynthia.sandoval@noaa.gov](mailto:cynthia.sandoval@noaa.gov)>; Camryn Anderson <[canderson@fisheries.org](mailto:canderson@fisheries.org)>  
**Subject:** Kampachi public comments on the NPDES permit

The public comment period on this permit closed on Sunday 9/29. Our Region 4 office is still receiving comments; close to 7,000 so far. The overwhelming majority of them are form e-mails opposing the project. The content of that letter is below. EPA Region 4 will be holding a public hearing in November since there's so much public interest.

The content of the letter probably won't surprise you. I think many of these environmental groups could actually be strong allies if they had good factual information.

Jenny Molloy  
U.S. EPA  
Water Permits Division  
202.564.1939  
[molloy.jennifer@epa.gov](mailto:molloy.jennifer@epa.gov)

I was alarmed to hear that the EPA is preparing to approve a National Pollution Discharge Elimination System Permit for Velella Epsilon, a marine finfish aquaculture facility in the Gulf of Mexico. I am writing to voice my opposition to this facility, and to marine finfish aquaculture everywhere. Please deny the NPDES permit and, in light of the importance of this issue, hold a public hearing with the opportunity for public comment before reaching a decision on the permit.

These underwater feedlots are bad news all around. They are horrible for the environment and public health. They can cause massive, catastrophic fish spills -- like the release of more than 263,000 Atlantic salmon from a floating feedlot in Washington State in 2017 -- which spread disease, risk genetic degradation, and create unnecessary competition with our already struggling native fish stocks. They attract and harm predators and other wildlife. They are corporate-driven, which only means higher profits at the expense of sustainable operations and quality products. These factory farms are leading to the demise of our wild fishing communities and related industries by placing downward pressure on fishing prices and creating competition for limited marine space.

Moreover, these industrial fish farms directly discharge a whole host of pollutants into public waters aside from spilling farmed fish, including anti-foulants, excess feed, and untreated fish waste. To grant a Clean Water Act NPDES permit for this industry is folly.

Despite Velella Epsilon's proposed plan to operate a "small-scale" pilot facility, it has made clear that it will concurrently seek a commercial permit for a larger, commercial operation. Approving the draft NPDES permit would open the floodgates to massive fish farms, and put our Gulf waters and coastal communities at significant risk.

The EPA is charged with protecting our environment. Permitting industrial ocean fish farms contradicts each aspect of your mission. The agency has the responsibility to hold a public hearing with the opportunity for public comment prior to making a decision on the permit. I also urge you to consider the vastly negative public opinion when it comes to this industry and deny the NPDES permit to Velella Epsilon. Please do everything you can to stop the industrialization of our oceans with factory fish farms.

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**From:** Halley Froehlich <[hefroehlich@ucsb.edu](mailto:hefroehlich@ucsb.edu)>

**Sent:** Tuesday, September 10, 2019 11:34 AM

**To:** Molloy, Jennifer <[molloy.jennifer@epa.gov](mailto:molloy.jennifer@epa.gov)>

**Cc:** Drue Winters <[dwwinters@fisheries.org](mailto:dwwinters@fisheries.org)>; Michael Rust <[mike.rust@noaa.gov](mailto:mike.rust@noaa.gov)>; Watson, Craig A <[cawatson@ufl.edu](mailto:cawatson@ufl.edu)>; Halley Froehlich <[froehlich@nceas.ucsb.edu](mailto:froehlich@nceas.ucsb.edu)>; Salze, Guillaume <[salzeg@ajiusa.com](mailto:salzeg@ajiusa.com)>; Cynthia Sandoval - NOAA Federal <[cynthia.sandoval@noaa.gov](mailto:cynthia.sandoval@noaa.gov)>; Camryn Anderson <[canderson@fisheries.org](mailto:canderson@fisheries.org)>

**Subject:** Re: Capitol Hill Aquaculture Briefing

Hi Jenny,

Thanks for sending this along. Definitely interested to see what comes out the other side.

Cheers,  
Halley

On Tue, Sep 10, 2019, 5:07 PM Molloy, Jennifer <[molloy.jennifer@epa.gov](mailto:molloy.jennifer@epa.gov)> wrote:

As fellow co-panelists in the aquaculture myth busting arena, I wanted to let you know that EPA has public noticed a permit for off-shore aquaculture in the Gulf of Mexico (see: <https://www.epa.gov/publicnotices/19fl00001-draft-national-pollution-discharge-elimination-system-permit-kampachi-farms> for the draft permit and the NEPA, ESA, EFH and other documents). Public comment closes September 29.

This is already drawing comment in the press: [https://www.upi.com/Top\\_News/US/2019/09/10/Plan-for-fish-farm-off-Floridas-Gulf-Coast-raises-environmental-concerns/2741568063948/](https://www.upi.com/Top_News/US/2019/09/10/Plan-for-fish-farm-off-Floridas-Gulf-Coast-raises-environmental-concerns/2741568063948/), some of which I'm sure won't surprise you.

Jenny Molloy

U.S. EPA

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**From:** Drue Winters <[dwinters@fisheries.org](mailto:dwinters@fisheries.org)>

**Sent:** Friday, June 7, 2019 3:38 PM

**To:** Mike Rust - NOAA Federal <[mike.rust@noaa.gov](mailto:mike.rust@noaa.gov)>; Watson, Craig A <[cawatson@ufl.edu](mailto:cawatson@ufl.edu)>; Halley Froehlich <[froehlich@nceas.ucsb.edu](mailto:froehlich@nceas.ucsb.edu)>; Molloy, Jennifer <[molloy.jennifer@epa.gov](mailto:molloy.jennifer@epa.gov)>; Salze, Guillaume <[salzeg@ajiusa.com](mailto:salzeg@ajiusa.com)>

**Cc:** Cynthia Sandoval - NOAA Federal <[cynthia.sandoval@noaa.gov](mailto:cynthia.sandoval@noaa.gov)>; Camryn Anderson <[canderson@fisheries.org](mailto:canderson@fisheries.org)>

**Subject:** FW: Briefing photos

All:

Thank you all so very much for speaking at yesterday's Capitol Hill aquaculture briefing. I thought it went very well and I so much appreciate you working so hard on the presentations and your remarks. That's the way science communication should be done!

We've posted some of the photos on AFS' social media outlets (Facebook, Twitter, and LinkedIn). Feel free to tag and share/re-tweet.

Here is the link to the album with the photos from the event:

<https://www.flickr.com/photos/americanfisheriessociety/albums/72157708977783091>

And here's a link to the fact sheet and video: [https://fisheries.org/category/news/policy-news/aquaculture/?fbclid=IwAR3RimEzyMQOSutVPAvCBGNn-Jbf5k7\\_8KGp4y-3Jwg7re\\_IZ9czQehvTMI](https://fisheries.org/category/news/policy-news/aquaculture/?fbclid=IwAR3RimEzyMQOSutVPAvCBGNn-Jbf5k7_8KGp4y-3Jwg7re_IZ9czQehvTMI)

I would love to offer a webinar to our members and maybe even opening it up to a broader audience if you all would be interested in giving your talks again via GoTo meeting. We could do it before the end of the month or we could time it when the AQUAA act drops.

Thanks again for your work on the briefing! Please do send me your receipts and an Excel spreadsheet with a tally at your (earliest) convenience so I can make sure your reimbursement gets processed before I go out on maternity leave.

Thank you!

Drue

Drue Banta Winters

Policy Director

American Fisheries Society

[dwinters@fisheries.org](mailto:dwinters@fisheries.org)